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October 12, 2020

VIA E-MAIL

The Honorable Gerald J. Pappert
U.S. District Court for the Eastern District of Pennsylvania
16614 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106
Chambers_of_Judge_Pappert@paed.uscourts.gov

Re: *FTC, et al. v. Thomas Jefferson University, et al.*, No. 2:20-cv-01113-GJP (E.D. Pa.)

Dear Judge Pappert:

On behalf of Defendants Thomas Jefferson University and Albert Einstein Healthcare Network ("Defendants"), please find, attached as Appendix A, a list of pre-marked exhibits that Defendants will move into evidence in the above-identified matter.

As discussed in open Court at the conclusion of the preliminary injunction hearing, the Parties invite the Court to evaluate whether and how it may wish to revisit any motions to seal that it previously denied as moot. To that end, Appendix A specifically identifies exhibits that either the Parties or any non-Party previously moved to seal, and the current disposition of such motions.

In addition to this list, Defendants are transmitting to Your Honor, through a separate email, electronic copies of a small set of exhibits that were not included with Defendants' initial submission of marked exhibits to Chambers. With that transmission, Your Honor now has electronic copies of the exhibits Defendants will move into evidence. Please let us know if you would like paper copies of these exhibits.

Thank you for Your Honor's consideration of this matter. Please let us know if the Court has any questions or needs any additional information in advance of the oral arguments on October 26, 2020.

The Honorable Gerald J.
Pappert

-2-

October 12, 2020

Respectfully,

/s/ Paul Saint-Antoine
Paul Saint-Antoine

Enclosures

cc: All Counsel (via electronic mail, with enclosures)

DX No.	PX No.	JX No.	Date	Description	Beginning Prod. No.	Ending Prod. No.	Motion to Seal	Motion to Seal Ruling	Motion to Seal Dkt No.	Motion to Seal Order Dkt. No.	Deposition Line Citations Subject to Motion to Seal
DX0108	PX3007	JX0020	8/23/2016	Email from J. Flynn to C. Morris Re: 2017 Product Offerings	AETNA0001746	AETNA0001747	Partial	Denied as Moot	Dkt. 171	Dkt. 229, 230	
DX0126			3/8/2018	Efficiency Relativities OE no PModel 2017 Narrow Optionv2.xlsx	AETNA0002140	AETNA0002140	Partial	Denied as Moot	Dkt. 171	Dkt. 229, 230	
DX0127			11/30/2016	Calendar Invite from Stephanie Mayes to C. Morris (among others) for a November 30, 2016 meeting with the subject: Network Meeting (In Person)	AETNA0002248	AETNA0002265	Partial	Denied as Moot	Dkt. 171	Dkt. 229, 230	
DX0136			6/16/2017	Email from Ruchita Kewalramini to Chris Morris (among others): Draft Materials – Aetna Pennsylvania strategic options – 6/19 workshop in Blue Bell	AETNA0003506	AETNA0003554	Partial	Denied as Moot	Dkt. 171	Dkt. 229, 230	
DX0204			2/28/2020	Email thread between Megan Carlo, Keith Markowitz, Michael Ungvary, and others re: "Review/Approve: UPDATED Doylestown Hospital Term Draft letters"	CI-TJU-LIT-00003347	CI-TJU-LIT-00003348	Partial	Denied	Dkt. 175	Dkt. 229, 230	
DX0205			2/28/2020	(Attachment to DX 204) Cigna template letter to	CI-TJU-LIT-00003349	CI-TJU-LIT-00003359	Partial	Denied	Dkt. 175	Dkt. 229, 230	
DX0206			10/8/2019	Email thread between Lisa Varian, Michael Ungvary, Keith Markowitz, and others re: Review/approve - Trinity Health (PA) term letters	CI-TJU-LIT-00000787	CI-TJU-LIT-00000800	Partial	Denied	Dkt. 175	Dkt. 229, 230	
DX0209			2/20/2014	Presentation: "Cigna / Cigna-HealthSpring Hospital Review for Philadelphia"	CIGTJU-000000001	CIGTJU-000000015	Partial	Denied	Dkt. 175	Dkt. 229, 230	
DX0226			March 2020	medPAC: Report to the Congress: Medicare Payment Policy (Ch. 8: Skilled nursing facility services)	DX0226-001	DX0226-032					
DX0306			9/5/2019	Hospital Contracts List	IBC3578-SUB	IBC3579-SUB					
DX0307				Network Adequacy summary for Jefferson	IBC0034	IBC0034					
DX0308			3/15/2017	Network Adequacy analysis for Jefferson	IBC0035	IBC0148					
DX0312			3/10/2017	Letter from P. Staudenmeier to P. DeAngelis	TJU-00745525	TJU-00745529					
DX0313			5/29/2017	Email among A. Coletta and P. DeAngelis re: Independence/Jefferson follow up	IBC010051-SUB	IBC010053-SUB					
DX0606			3/11/2019	Doylestown Health Roadmap for Independence - Update	FTC-Doylestown-000000049	FTC-Doylestown-000000092	Complete	Denied as Moot	Dkt. 179	Dkt. 229, 230	
DX8545			11/11/2016	EHN Confidential Information Package	AEHN-0897993	AEHN-0898180	Complete	Denied as Moot	Dkt. 192	Dkt. 232	
DX8660			1/30/2017	Referral / Denial Logs	AEHN-WP-0000185	AEHN-WP-0000191	Complete	Denied as Moot	Dkt. 192	Dkt. 232	
DX8669			12/7/2018	Email from Christopher McTiernan to Barry	AEHN-0271501	AEHN-0271501	Complete	Denied as Moot	Dkt. 192	Dkt. 232	
DX0403			6/25/2017	Jefferson 6_26 Exec Meeting materials.msg	UHC_SDT_00015436; UHC_SDT_00015464	UHC_SDT_00015436; UHC_SDT_00015474	Partial	Denied as Moot	Dkt. 176	Dkt. 229, 230	
DX8780	PX2184	JX0008		Email from K. Kaufman to B. Freedman and S.	AEHN-AG-FC-	AEHN-AG-FC-0000160	Complete	Denied as Moot	Dkt. 192	Dkt. 232	
	PX2404	JX0003	1/7/2019	Sampling of referral/denial logs for Moss	AEHN-1457824	AEHN-1457833	Partial	Denied as Moot	Dkt. 192	Dkt. 232	
DX0503				Printout of Deer Meadows website	DX0503-001	DX0503-003					
DX0317			2/10/2017	IHG Transformation - Network optimization and Product Design: Strategic Planning Workshop Pre-Reading Material	IBC7584-SUB	IBC7604-SUB	Partial	Denied	Dkt. 181, 218, 228	Dkt. 229, 230	
DX0505			8/8/2018	Internal MLH email from Ed McKillip Re "Rehab 5-year Projection"	MLH_00078143	MLH_00078144					
DX0323			3/24/2017	Cost of Termination - Jefferson Health System	IBC011440-SUB	IBC011441-SUB	Partial	Denied	Dkt. 181, 218, 228	Dkt. 229, 230	
DX0332			7/16/2018	Project Rushmore Business Plan: Scope & Preliminary Findings	IBC008791-SUB	IBC008851-SUB	Partial	Denied	Dkt. 181, 218, 228	Dkt. 229, 230	
DX3000	PX1005	JX0083	9/6/2016	GCOUNSEL-#24177-v1-DVACO_Aetna_Product, attaching Pennsylvania Employee Benefits Trust Fund Narrow Network Analysis and Recommendation	TJU-00312259	TJU-00312260	Complete	Denied as Moot	Dkt. 168	Dkt. 232	
DX0601			11/13/2019	November 13, 2019 DH Official Bond Statement	DH0000121	DH0000416					
DX0602				Doylestown Hospital - Inpatient Market Share (through June 2019)	DH0000559	DH0000603					
DX0604			10/20/2016	Mini Retreat Doylestown Hospital and Doylestown Health Foundation Board of Directors Meeting Minutes	DH0000614	DH0000615					

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DX9337	PX1036	JX0080	6/20/2018	Magee Rehabilitation - 2019-2021 Strategic Plan	TJU-00004095	TJU-00004152	Partial	Denied as Moot	Dkt. 168	Dkt. 232	
DX0704				Appendix A to Official Bond Statement	HRHS-000001	HRHS-000055					
DX9348			"July 2018"	Integration Accomplishments Update - July 2018	TJU-00004854	TJU-00004892	Complete	Granted	Dkt. 168	Dkt. 232	
DX1106			2017	Kessler presentation: "Strategic Planning Session"	KESSLER-000164	KESSLER-000188					
DX9413			2/20/2019	Abington Jefferson Health Operations Plan	TJU-00580757	TJU-00580767	Complete	Denied as Moot	Dkt. 168	Dkt. 232	
DX1112				Kessler presentation: "2019 Strategic Positioning"	KESSLER-000015	KESSLER-000028					
DX9436			8/8/2017	IBC - Jefferson Health Agreement Effective September 1, 2017	TJU-01365340	TJU-01365341	Complete	Denied as Moot	Dkt. 168	Dkt. 232	
DX9440			11/1/2017	IBC Snapshot	TJU-01802427	TJU-01802428	Complete	Denied as Moot	Dkt. 168	Dkt. 232	
DX1109				Kessler presentation: "Kessler Marlton"	KESSLER-000146	KESSLER-000163	Partial	Denied as Moot	Dkt. 137	Dkt. 229, 230	
DX1408			6/4/2020	Letter from Congress (Porter, Doggett, Scanlon, DeLauro) to Jonathan Sokoloff	DX1408-001	DX1408-003					
DX1506			10/1/2018	New Trustee Orientation	GV-1049	GV-1050					
DX1512			3/1/2018	Grand View Health Draft Phase I Report	GV-1608	GV-1610					
DX1524			1/1/2019	Whitecap Report - GVH Strategic Capital Asset Plan Final Report	GV-009874; GV-009876	GV-009874; GV-009876					
DX1610			2/12/2020	"Philadelphia Inquirer article entitled Mercy Hospital in West Philadelphia faces closure as an inpatient facility"	DX1610-001	DX1610-009					
DX0504			8/24/2016	Bryn Mawr Rehab Consumer Campaign: Marketing and Media Strategy & Creative Concept, dated August 24, 2016	MLH_00082819	MLH_00082819	Partial	Denied as Moot	Dkt. 169	Dkt. 229, 230	
DX0506			4/12/2016	Internal MLH email from Lisa Lefkowitz to Robert Kleman re: "Aetna-MLH Extension Agreement - Draft 4-12-16"	MLH_00051672	MLH_00051673	Complete	Denied as Moot	Dkt. 169	Dkt. 229, 230	
DX0507			11/8/2017	Bryn Mawr Rehab Foundation: Health Care Market Overview	MLH_00048845	MLH_00048845	Partial	Denied as Moot	Dkt. 169	Dkt. 229, 230	
DX0511			3/13/2017	LMC Strategic and Business Planning, Network Growth Presentation	MLH_00095240	MLH_00095240	Partial	Denied as Moot	Dkt. 169	Dkt. 229, 230	
DX8717			4/29/2016	George Huang email to internal MLH re: Rehab Market Summaries - updated with full FY15	MLH_00081552	MLH_00081554	Partial	Denied as Moot	Dkt. 169	Dkt. 229, 230	
DX8723			7/10/2017	Email from Michelle Brennan to Praveen Shanbhag Re: Rehab	MLH_00094245	MLH_00094245	Complete	Denied as Moot	Dkt. 169	Dkt. 229, 230	
DX1803			Sept. 2018	CardSurg MSDRG Market Analysis	UPHS 003111	UPHS 003123	Complete	Denied as Moot	Dkt. 142	Dkt. 229, 230	
DX2109			12/31/2019	Genesis 10-K	DX2109-001	DX2109-138					
DX1809			10/11/2017	Penn Medicine Primary Care, Micro Market Assessment, Steering Committee Mtg October 11,	FTC-Penn-00003595	FTC-Penn-00003626	Complete	Denied as Moot	Dkt. 148	Dkt. 229, 230	
DX2409			6/22/2020	LMSD Data re Medical Claims and Employee Enrollment	LMSD-000042	LMSD-000042					
DX0906			9/13/2017	Suburban Community Hospital Trends; Roxborough Memorial Hospital Trends	PRIME_000166	PRIME_000175	Complete	Denied as Moot	Dkt. 174	Dkt. 229, 230	
DX8000			8/10/2019	Expert Report of Cory S. Capps, Ph.D.							
DX8100				Expert Report of Subramaniam Ramanarayanan	DX8100-001	DX8100-220					
DX8200				Expert Report of Todd Patnode	DX8200-001	DX8200-100					
DX8300-1			8/10/2019	Expert Report of Lisa N. Ahern							
DX8303	PX6016	JX0024	5/31/2019	Thomas Jefferson University & Albert Einstein Healthcare Network Rationalization and Integration							
DX8504			10/31/2017	Letter to UPMC discussing the contingencies they placed on moving forward with a transaction	AEHN-0123287	AEHN-0123294					
DX8505				Objectives Document	AEHN-0140780	AEHN-0140782					
DX8506			11/24/2017	Email from Reshma Patel to Dixie James	AEHN-0152853	AEHN-0152853					
DX8508			2/23/2015	Email from Jayne Morgon to David Ertel	AEHN-0160564	AEHN-0160564					
DX8509			2/9/2018	Email from Beth Duffy to Dixie James Re: Main Line Health to build major KoP Health Center	AEHN-0192808	AEHN-0192810					

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DX8510			6/7/2018	Presentation (Philadelphia Hospital Transplant	AEHN-0201811	AEHN-0201811					
DX8512			8/11/2014	Email from Reshma Patel to Craig Sieving	AEHN-0225940	AEHN-0225941					
DX8517			10/14/2016	Post-Acute Strategic Plan Kickoff Meeting 10/14/16	AEHN-0357101	AEHN-0357101					
DX8521			4/29/2015	Email from R. Lefton to P. Seminara re: Moss losing market share to BMR	AEHN-0413291	AEHN-0413291					
DX2305				"FTC Competitor Data" i.e. data provided to FTC re: CID	STM0091	STM0140	Partial	Denied	Dkt. 138	Dkt. 229, 230	
DX8553			4/20/2017	MossRehab Feasibility Study containing SWOT analysis discussing SNFs and regulatory changes	AEHN-1458711	AEHN-1458714					
DX8556			10/3/2017	Presentation (Phoenixville, Pottstown and Chestnut Hill AnalysisAugust 2017)	AEHN-2081562	AEHN-2081562					
DX8562			6/19/2014	Email from G. Blaney to M. Nuccio	AEHN-3838801	AEHN-3838802					
DX8605			9/29/2016	Minutes of the Meeting of the Board of Trustees of Einstein, dated September 29, 2016	AEHN-5774833	AEHN-5774836					
DX8652			9/6/2017	Email from Alberto Esqueanazi to Thomas Smith	AEHN-WP-0000089	AEHN-WP-0000089					
DX8653			9/6/2017	MC IRF Data Compare 2016	AEHN-WP-0000090	AEHN-WP-0000091					
DX8654			12/29/2017	Email from Alberto Esqueanazi to Einstein Leadership	AEHN-WP-0000092	AEHN-WP-0000092					
DX8655			8/3/2018	Email from Ruth Lefton to Alberto Esqueanazi	AEHN-WP-0000093	AEHN-WP-0000093					
DX8659			4/25/2017	Presentation Re PAC Strategic Plan	AEHN-WP-0000157	AEHN-WP-0000183					
DX1301			10/27/2016	Shannondell brochure	Shares-00912509	Shares-00912516	Complete	Denied as Moot	Dkt. 160	Dkt. 229, 230	
DX8665			7/27/2017	Email from Kathy Gleason to Alberto Esqueanazi	AEHN-WP-0000197	AEHN-WP-0000203					
DX8666			8/2/2016	Email from Thomas Smith to Joan Gubernick	AEHN-WP-0000204	AEHN-WP-0000204					
DX1306			3/1/2016	King & More Marketing overview	Shares-01211205	Shares-01211213	Complete	Denied as Moot	Dkt. 160	Dkt. 229, 230	
DX8671			11/6/2017	Kaufman Hall, Preliminary Evaluation of "Plan B" Strategic Options	AEHN-WP-0000370	AEHN-WP-0000426					
DX1314			2/7/2019	Email from D. Freed to W. Kim re. competitors to add to "CRM" system	Shares-01201733	Shares-01201743	Complete	Denied as Moot	Dkt. 160	Dkt. 229, 230	
DX1901			8/1/2017	Einstein Healthcare Network Profile	TH-001266	TH-001331	Complete	Denied as Moot	Dkt. 143	Dkt. 229, 230	
DX1904				Rehabilitation at Phoenixville Hospital - Strategic Plan - 2020	TH-003552	TH-003552	Complete	Denied as Moot	Dkt. 143	Dkt. 229, 230	
DX8781	PX2476	JX0009		EMCP, EMCEP, and Moss Funded and Deferred Capital Expenditures (Dec. 11 2019)	AEHN-AG-FC-0000161	AEHN-AG-FC-0000161	Complete	Denied as Moot	Dkt. 186	Dkt. 232	
DX8791	PX2294	JX0019	6/3/2015	Series 2015A Note	AEHN-WP-0001019	AEHN-WP-0001298					
DX1905			1/23/2019	Tower Health - Integrated Strategic Financial Plan	TH-000323	TH-000389	Complete	Denied as Moot		Dkt. 229, 230	
DX8794	PX7023	JX0035	7/8/2020	Gerard Blaney (Einstein) deposition, 7/8/2020							
DX1908			2/1/2018	Pottstown Hospital Market Assessment and Strategic Plan	TH-001078	TH-001163	Complete	Denied as Moot	Dkt. 143	Dkt. 229, 230	
DX1909			2/1/2018	Phoenixville Hospital Market Assessment and Strategic Plan	TH-000985	TH-001077	Complete	Denied as Moot	Dkt. 143	Dkt. 229, 230	
DX8799	PX7021	JX0033	7/7/2020	Jack Carroll (Jefferson) deposition, 7/7/2020							
DX8802	PX7039	JX0051	7/16/2020	Eric Demkin (Lower Merion School District) 30(b)(6) deposition, 7/16/2020							
DX8803	PX7020	JX0032	7/7/2020	Beth Duffy (Einstein) deposition, 7/7/2020							
DX0402			1/14/2020	Email from S. Nusrat to C. Winings re: Einstein Termination	UHC-FTCPA-0001932	UHC-FTCPA-0001939	Partial	Denied as Moot	Dkt. 176	Dkt. 229, 230	
DX0405				IBC Analysis	UHC_SDT_00015436; UHC_SDT_00015456	UHC_SDT_00015436; UHC_SDT_00015463	Partial	Denied as Moot	Dkt. 176	Dkt. 229, 230	
DX0450			8/20/2018	Jefferson Health System Commercial Renegotiation 2017	UHC_SDT_00015786	UHC_SDT_00015789	Complete	Denied as Moot	Dkt. 176	Dkt. 229, 230	
DX8810	PX7053	JX0065	7/29/2020	Lori Gustave (Penn Medicine) deposition, 7/29/2020							
DX8814	PX7042	JX0054	7/16/2020	Michael Laign (Holy Redeemer) 30(b)(6) deposition, 7/16/2020							
DX9498				Jefferson Health - Impact Assessment	UHC_NonPatientCID_00000502	UHC_NonPatientCID_00000508	Partial	Denied as Moot	Dkt. 176	Dkt. 229, 230	

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DX8792	PX7015	JX0027	6/30/2020	Daniel Ahern (Tower) 30(b)(6) deposition, 6/30/3030			Complete	Denied as Moot	Dkt. 143	Dkt. 229, 230	71:7-10, 71:19-72:9, 80:4-22, 109:19-111:19, 131:11-17, 132:3-5, 134:13-135:16, 74:5-22, 75:22-76:14, 129:18-130:12, 133:8-134:12, 203:1-5
DX8825	PX7026	JX0038	7/10/2020	Lawrence Reichlin (Einstein) deposition, 7/10/2020							
DX8827	PX7033	JX0045	7/14/2020	Phyllis Schlichtmann (Kessler) 30(b)(6) deposition, 7/14/2020							
DX8795	PX7038	JX0050	7/15/2020	James Brexler (Doylestown) 30(b)(6) deposition, 7/15/2020			Partial	Denied as Moot	Dkt. 179	Dkt. 229, 230	82:15-83:1, 83:10-20, 85:21-86:8
DX8797	PX7022	JX0034	7/7/2020	Michael Buongiorno (Main Line) 30(b)(6) deposition, 7/7/2020			Partial	Denied as Moot	Dkt. 169	Dkt. 229, 230	42:12-44:16, 49:22-50:21
DX9303	PX1063	JX0078	9/14/2018	System Integration Agreement	TJU-00000001	TJU-00000246					
DX9304	PX1413	JX0079	"April	Organizational Profile	TJU-00001112	TJU-00001207					
DX9308	PX1140	JX0022	9/12/2018	Meeting Minutes of the Special Meeting of the TJU Board of Trustees	TJU-06219474	TJU-06219505					
DX9334			"November 2018"	Comparison to Jefferson Health & Summary Organizational Review of Penn Medicine University of Pennsylvania Health System	TJU-00003591	TJU-00003618					
DX8805	PX7025	JX0037	7/10/2020	Jack Flynn (Jefferson), deposition, 7/10/2020			Partial	Denied as Moot	Dkt. 168	Dkt. 232	150:6-9
DX9344			5/30/2019	Jefferson Health Integration – FY17 Accomplishments	TJU-00004613	TJU-00004622					
DX9345			5/30/2019	Jefferson Health Integration – FY18 Accomplishments	TJU-00004623	TJU-00004629					
DX8806	PX7055	JX0067	8/4/2020	Dan Freed (Shannondell) 30(b)(6) deposition,			Complete	Denied as Moot	Dkt. 160	Dkt. 229, 230	127:7-23, 69:2-20, 76:1-17, 62:14-
DX9351			"April 2019"	Integration Accomplishments Update - April 2019	TJU-00004928	TJU-00004967					
DX9371			11/8/2017	Jefferson Health System Integration Playbook	TJU-00005517	TJU-00005591					
DX9383			6/19/2018	Jefferson New Jersey Washington Township: Inpatient Tower Analysis	TJU-00222228	TJU-00222252					
DX9402			11/20/2018	Magee Marketing Plan 2019	TJU-00393851	TJU-00393978					
DX9412	PX1054	JX0090	3/5/2018	Email from Steve Klasko to Nathan Kaufman re: Tuesday night at ache	TJU-00530994	TJU-00530995					
DX8808	PX7024	JX0036	7/8/2020	Philip Green (PDG Consulting), deposition, 7/8/2020			Partial	Denied as Moot	Dkt. 168	Dkt. 232	
DX9417			9/26/2018	Competitor Health System Profile, Grand View Health	TJU-00706599	TJU-00706627					
DX9428			10/14/2014	One on One	TJU-01082832	TJU-01082833					
DX9431			5/7/2016	Re: Jefferson Head and Neck Center	TJU-01307540	TJU-01307543					

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DX8822	PX7050	JX0062	7/30/2020	Christopher Morris (Aetna) 30(b)(6) deposition, 7/30/2020			Partial	Denied as Moot	Dkt. 171	Dkt. 229, 230	116:1, 116:5-7, 124:10-12, 109:19-22, 110:2-6, 110:8-9, 110:12-16, 110:18-19, 111:1-3, 111:5, 63:10-12, 63:15-16, 63:18-22, 64:1-3, 66:8-12, 66:20-67:6, 67:9-10, 61:9-10, 61:12-13, 61:16-17, 61:20-22, 63:4-5, 107:15-16, 107:18-20, 108:1-8, 108:10-13, 31:19-20, 124:10-12, 124:15-17
DX8823	PX7013	JX0025	6/23/2020	Donna Phillips (Bryn Mawr) 30(b)(6) deposition, 6/23/2020			Partial	Denied as Moot	Dkt. 169	Dkt. 229, 230	143:19-22
DX9441	PX1067	JX0094	8/30/2016	Email re: Next steps and principles	TJU-01815906	TJU-01815911					
DX9444			9/17/2018	Re: Grandview Hospital Announcement Call today	TJU-01892811	TJU-01892813					
DX9445			7/21/2016	RE: Space	TJU-02048090	TJU-02048094					
DX9466			3/13/2018	Ann's Choice	TJU-04317710	TJU-04317710					
DX9472			"March 2018"	Doylestown Health Strategy & Business Development	TJU-05266933	TJU-05266961					
DX9483			N/A	2016 Referral and Denial Log	TJU-06075189	TJU-06075189					
DX9484			N/A	2017 Referral and Denial Log	TJU-06075190	TJU-06075190					
DX9485			N/A	2018 Referral and Denial Log	TJU-06075191	TJU-06075191					
DX9486			N/A	2019 Referral and Denial Log	TJU-06075192	TJU-06075192					
DX9488			2/23/2013	RE: Einstein Montgomery	TJU-06075228	TJU-06075229					
DX9491			4/21/2017	Follow-up Items	TJU-06077642	TJU-06077643					
DX9496			2/8/2018	Email re: Einstein/TJU Letter of Intent ATTORNEY-CLIENT PRIVILEGE (4c-30)	TJU-06218866	TJU-06218872					

DX No.	PX No.	JX No.	Date	Description	Beginning Prod. No.	Ending Prod. No.	Motion to Seal	Motion to Seal Ruling	Motion to Seal Dkt No.	Motion to Seal Order Dkt. No.	Deposition Line Citations Subject to Motion to Seal
DX8831	PX7043	JX0055	7/20/2020	Andrew Shelak (Prime) 30(b)(6) deposition, 7/20/2020			Partial	Denied as Moot	Dkt. 174	Dkt. 229, 230	52:9-10, 52:14-16, 53:5-7, 53:9, 57:6-15
DX9507	PX7056	JX0068	8/5/2020	30(b)(6) Deposition Transcript of Grand View Health (John Mark Horne)							
DX8834	PX7052	JX0064	7/29/2020	Cynthia Winings (United) 30(b)(6) deposition, 7/29/2020			Partial	Denied as Moot	Dkt. 176	Dkt. 229, 230	144:11-145:1, 146:20-148:4, 78:19-79:17, 112:3-114:22, 141:22-142:12, 281:12-17, 282:18-283:22, 238:3-240:10, 100:18-101:10, 103:4-107:12, 116:4-121:1, 123:10-131:9, 400:18-404:11, 185:21-187:17, 191:7-192:3, 166:15-167:3, 167:14-19, 168:3-19, 225:1-16, 232:16-10, 236:15-19, 204:15-207:7, 341:15-342:8, 353:13-354:10, 397:7-17, 399:1-3, 400:18-404:9, 407:14-408:16, 409:20-410:8
DX9531				Strategic Options Detailed Profiles of Potential	AEHN-0545024	AEHN-0545075					
DX9532			11/12/2019	Email from K. Doghramji to K. Kinslow attaching One Jefferson Highlights Update 2H FY19	TJU-06204150	TJU-06204177					
DX9533			7/26/2016	Integration Year End Summary Report 7-26-16	TJU-02154086	TJU-02154090					
DX9534			10/17/2018	FW: Obstetric Analysis	TJU-02529251	TJU-02529259					
DX9601			1/19/2019	Philadelphia Inquirer Article: How a Pending Jefferson Deal Could Reshape Philadelphia's health-	DX9601-001	DX9601-006					
DX9606	PX1141	N/A	2/12/2017	Email from Peter DeAngelis to Stephen Klasko re: RE: Follow up (02/12/17)	TJU-00047129	TJU-00047133					
DX9529			9/30/2019	Prospect Medical Holdings, Inc.	CROZER0001490	CROZER0001522	Complete	Denied	Dkt. 194	Dkt. 229, 230	
DX9607	PX1375	N/A	4/10/2017	Email from Sharon Galup to Peter DeAngelis re: RE: Independence Blue Cross Summary 4/9/17 (04/10/17)	TJU-00879271	TJU-00879279	Complete	Denied	Dkt. 168	Dkt. 232	

DX No.	PX No.	JX No.	Date	Description	Beginning Prod. No.	Ending Prod. No.	Motion to Seal	Motion to Seal Ruling	Motion to Seal Dkt No.	Motion to Seal Order Dkt. No.	Deposition Line Citations Subject to Motion to Seal
DX9610	PX1243	N/A	9/7/2016	Email from Michael Walsh to Peter DeAngelis re: AJH Inpatient Market Share Report (FY2016 Qtr 2) w/Attach: ATT00001.htm; Abington - Jefferson Health Market Share.pdf; ATT00006.htm; ATT00003.htm; image002.png; image005.png; image003.png; image004.png; ATT00005.htm; ATT00004.htm; ATT00002.htm; image001.png (09/07/16)	TJU-03023669	TJU-03023724					
DX9609	PX7010	N/A	11/6/2019	Investigational Hearing Transcript of Christopher Morris (11/06/19)	DX9609-001	DX9609-025	Partial	Denied as Moot	Dkt. 171	Dkt. 229, 230	
	PX2444	JX0004	2/15/2019	Presentation by P. Seminara re: post-acute care continuum dated Feb. 15, 2019.	AEHN-3059436	AEHN-3059437					
	PX1303			Email from Stephen Klasko to Phil Green; Robert Cindrich; Stephen Boochever re: Payor Issues (05/19/17)	TJU-06080893	TJU-06080896					